



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

DIAGNOSTIC RESEARCH

GROUP, LLC,

Plaintiff

v.

TOSHIBA AMERICA MEDICAL

SYSTEMS, INC.,

Defendant

x

x

x

x

x

x

x

x

x

**ORIGINAL**

U.S. District Court

Civil No. L-02-3020

Court Case No.

03-C-02-006016

Deposition of KENT B. STANSBURY

Baltimore, Maryland

Thursday, March 20, 2003

12:31 P.M.

Job No.: 1-14098

Pages: 1 - 45

Reported by: Sharon D. Livingston, CSR-RPR



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**NATIONWIDE C O U R T R E P O R T E R S A N D V I D E O G R A P H E R S**

1           •       Until it has to be brought back up to  
speed; (is that correct?

3                   MR. SCHUMM: I'll object to the form.

4       BY MR. SPERLING:

          •       Why don't you tell me what has to be done  
6       to get the magnet back.

          A       Sure. After a quench we need to monitor  
the temperatures on the magnet, **within** the magnet, to  
9       make sure they're at superconducting temperatures.  
10       And then once that's occurred, then we can restore  
11       the current into the magnetic windings inside the  
12       magnet. We have to bring in a power supply and what  
13       we refer to as a ramp supply.

14           Q       And what's that ramp supply?

15                   It's a power supply, **and** it allows us to  
16       we physically hook it into the magnet, and it allows  
17       us to put current into the windings, to the  
18       superconducting **windings** of the magnet.

19           •       Now, doesn't the magnet always have current  
20       running through it?

21                   Yes, it does.

22                   So what'    the difference between that

1 the document if it will refresh your recollection.

2 A Sure.

3 • Would it help you?

4 A Yeah. I don't remember off the top of my  
5 head when the date was that that device was  
6 installed.

7 • I can just show you what's been marked, a  
8 three-page, what's been marred as Exhibit 18 in  
9 Jeffrey Low's deposition. It's a letter dated  
10 December 23, '98.

11 (Document tendered to witness.)

12 A Okay.

13 • Does that refresh your recollection as to  
14 what was installed?

15 A Yes.

16 • And can you describe what that was?

17 A It was a remote monitoring device that  
18 monitored the chiller water temperature and also the  
19 internal temperatures of the magnet itself.

20 • Now, the chiller was something that was  
21 covered under Toshiba's warranty; is that correct?

22 A Correct.

1           •     Okay. But you don't have any records with  
2     regard to the chiller that was installed in this  
3     particular piece of equipment; is that correct, sir?

4           A     Any records as far as what?

5           •     Warranties or anything like that with  
6     regard to this particular piece of equipment.

7                     No, .I do not.

8           Q     And Toshiba would take the responsibility  
9     for getting the magnet back **up** to speed? Obviously  
10    Toshiba would call Arctic Chiller, have Arctic  
11    Chiller do the repair if you could not do it  
12    yourself, correct?

13          A     Yes.

14          •     And then Toshiba would come out and finish  
15    the job on the magnet; is that correct?

16                     Yes.

17          Q     In other words, Toshiba does not take the  
18    position that just **because** the Arctic Chiller failure  
19    caused the problem, that the warranty- is. not in  
20    effect; is that correct?

21          A     Yes, that's correct.

22                     MR. SCHUMM. I object to the question.